

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CRIMINAL NO. 20-CR-30102-NJR
vs.)	
)	
JAMES R. SEARS,)	
)	
Defendant.)	

STIPULATION OF FACTS

Steven D. Weinhoeft, United States Attorney for the Southern District of Illinois, and Alexandria M. Burns, Assistant United States Attorney for said District, herewith enter into the following Stipulation of Facts with the Defendant:

1. On and between May 25, 2020, and June 27, 2020, James R. Sears and Kalyn E. Hoggatt communicated with an individual identified as a 13 year old minor on an online dating application. The minor profile was an FBI Online Covert Employee ("OCE").
2. Sears began communications with the OCE and then introduced Hoggatt to the OCE. Conversations continued between Sears, Hoggatt, and the OCE by text message for over one month.
3. During that time, Sears and Hoggatt described numerous sexual acts they planned to engage in with the minor. Sears and Hoggatt planned to travel to the Southern District of Illinois to meet the minor and take the minor to a hotel to engage in sexual contact.
4. On June 14, 2020, Hoggatt requested a photo of the minor's genitals from the OCE. Sears confirmed that Hoggatt was requesting an image of the minor's genitals. Specifically, the following conversation ensued:

HOGGATT: I would love to see a pic of the meat james and I will be eating since

you wont show us a pic of the booty. Hehe

OCE: You mean like my weaner? Lol

SEARS: I do believe that's what he means lol


OCE: Is that what your asking for Mr Kalyn. Lol

HOGATT: That is exactly what I'm asking for my love!

5. On June 27, 2020, Sears requested an address from the OCE. Sears and Hoggatt were directed to an undercover residence in Madison County, within the Southern District of Illinois. At that time, Sears and Hoggatt arrived at the residence and were taken into custody.
6. A Samsung SM-5102DL cellular phone bearing IMEI: 357855107911469 was seized from Sears. The Samsung cellular phone Sears used to communicate with the OCE had been mailed, shipped, or transported in and affecting interstate and foreign commerce and was not manufactured in the State of Illinois.
7. On June 27, 2020, Sears was interviewed by law enforcement. Sears admitted the conversations with the OCE and that he believed the OCE was a 13 year old minor. Sears admitted he and Hoggatt intended to have sexual intercourse and oral sex with the minor. Sears admitted that he and Hoggatt had booked a hotel room for that purpose.

Respectfully submitted,


JAMES R. SEARS
Defendant


DANIEL SCHATTNIK
Attorney for Defendant


ALEXANDRIA M. BURNS
Assistant U.S. Attorney

Date: 11-15-21

Date: 11/15/2021